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and Debtors in Possession*

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

In re:

PG&E CORPORATION,

- and -

**PACIFIC GAS AND ELECTRIC
COMPANY,**

Debtors.

- ☐ Affects PG&E Corporation
☐ Affects Pacific Gas and Electric Company
☒ Affects both Debtors

** All papers shall be filed in the Lead Case,
No. 19-30088 (DM).*

Case No. 19-30088 (DM)
Chapter 11
(Lead Case) (Jointly Administered)

**NOTICE OF FILING OF REVISED
PROPOSED ORDER APPROVING
LEASE ASSUMPTION MOTION**

Re: Dkt. No. 3726
Date: September 24, 2019
Time: 9:30 a.m. (Pacific Time)
Place: United States Bankruptcy Court
Courtroom 17, 16th Floor
San Francisco, CA 94102

1 **PLEASE TAKE NOTICE** that on January 29, 2019, PG&E Corporation and Pacific Gas and
2 Electric Company, as debtors and debtors in possession (collectively, the “**Debtors**”) in the above-
3 captioned chapter 11 cases, each filed a voluntary petition for relief under chapter 11 of title 11 of the
4 United States Code with the United States Bankruptcy Court for the Northern District of California
5 (San Francisco Division) (the “**Bankruptcy Court**”).

6 **PLEASE TAKE FURTHER NOTICE** that on August 27, 2019, the Debtors filed the *Fifth*
7 *Omnibus Motion of Debtors Pursuant to 11 U.S.C. §§ 365(a), Fed. R. Bankr. P. 6006, and B.L.R. 6006-1 for*
8 *an Order Approving Assumption of Real Property Leases* [Docket No. 3726] (the “**Motion**”). A hearing
9 on the Motion is scheduled to be held on **September 24, 2019, at 9:30 a.m. (Pacific Time)** (the
10 “**Omnibus Hearing**”) at the Bankruptcy Court in the courtroom of the Honorable Dennis Montali,
11 United States Bankruptcy Judge, Courtroom 17, 16th Floor, 450 Golden Gate Avenue, San Francisco,
12 California 94102.

13 **PLEASE TAKE FURTHER NOTICE** that a proposed form of order with respect to the relief
14 sought therein was attached as Exhibit A to the Motion. A schedule of the Real Property Leases (as
15 defined in the Motion) proposed to be assumed by the Debtors pursuant to the Motion along with any
16 Cure Payments (as defined in the Motion) to be made in connection with such assumption, was attached
17 as Exhibit B to the Motion (Exhibits A and B together, the “**Original Proposed Order**”).

18 **PLEASE TAKE FURTHER NOTICE** that on September 10, 2019, Realty Income
19 Corporation filed a reservation of rights with respect to the Motion [Docket No. 3859].

20 **PLEASE TAKE FURTHER NOTICE** that, attached hereto as **Exhibit 1-1** and **Exhibit 1-2**,
21 respectively, are copies of the Debtors’ revised proposed order on the Motion (including the amended
22 list of Real Property Leases, the “**Revised Proposed Order**”) and a redline comparison of the Revised
23 Proposed Order against the Original Proposed Order. The Revised Proposed Order incorporates
24 changes to reflect updated Cure Payments to certain Real Property Leases, as well as additional Real
25 Property Leases with the California State Lands Commission that the Debtors wish to assume.

26 **PLEASE TAKE FURTHER NOTICE** that the Debtors reserve the right to further amend,
27 modify, or supplement the proposed order on the Motion at any time up to and during the Omnibus
28 Hearing.

29 **PLEASE TAKE FURTHER NOTICE** that copies of the pleadings and other documents
30 identified herein can be viewed and/or obtained: (i) by accessing the Bankruptcy Court’s website at
31 <http://www.canb.uscourts.gov>, (ii) by contacting the Office of the Clerk of the Court at 450 Golden
32 Gate Avenue, San Francisco, CA 94102, or (iii) from the Debtors’ notice and claims agent, Prime
33 Clerk LLC, at <https://restructuring.primeclerk.com/pge> or by calling (844) 339-4217 (toll free) for
34 U.S.-based parties; or +1 (929) 333-8977 for International parties or by e-mail at:
35 36 Bankruptcy Court’s website.

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1 Dated: September 23, 2019

2 **WEIL, GOTSHAL & MANGES LLP**
3 **KELLER & BENVENUTTI LLP**

4 /s/ Thomas B. Rupp

5 Thomas B. Rupp

6 *Attorneys for Debtors and Debtors in Possession*
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